

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION**

In re:

Garcia Grain Trading Corp.

Case No. 23-70028

Debtor(s).

Ford Motor Credit Company LLC,
Movant.

Chapter 11

v.

Garcia Grain Trading Corp.

Debtor(s)

**NOTICE OF TERMINATION OF STAY
(This Notice Relates to Doc. #846)**

Notice of Termination of Stay is hereby given pursuant to the terms of the above referenced Debtor's confirmed Third Amended Plan ("Amended plan") (Doc. 763) as to the 2020 FORD F150 and VIN # 1FTEW1E59LFB68462 (the "Collateral") as follows:

1. On September 24, 2020, Debtor Garcia Grain Trading Corp. executed and delivered a Texas Motor Vehicle Retail Installment Sales Contract to Movant. A copy of Contract is attached hereto as Exhibit 1.
2. Debtor is the owner of one (1) 2020 FORD F150 (V.I.N. 1FTEW1E59LFB68462). The transaction occurred and the Title passed accordingly. A copy of Title is attached hereto as Exhibit 2.
3. The Amended Plan failed to provide for treatment of Ford Motor Credit Company LLC's allowed secured claim.
4. As of August 9, 2024, the Debtor has failed to make payments required by the Contract and is in default as follows:

a. Payment Due March 31, 2024

\$2,610.90

Notice of Termination of Stay

b. Payment Due June 28, 2024

\$2,610.90

Total Arrearage: \$5,221.80

5. The Debtor is in default under the terms of the Amended Plan because Debtor has failed to make post-petition payments and failed to provide for payment of the Arrearage. A true and correct copy of the payment history of payments made is attached as Exhibit 3.

6. Notice of termination of stay is now being served on Debtor, Debtor's counsel and the United States Trustee as required by the Order Post Confirmation.

As a result of Debtor's default, the Automatic Stay of 11 U.S.C § 362 is hereby declared to be terminated as it applies to Movant and the Collateral pursuant to the provisions of the Amended Plan and Order Post Confirmation.

Respectfully Submitted by:
Quilling, Selander, Lownds,
Winslett & Moser, P.C.
/s/ Patrick M. Lynch
Patrick M. Lynch
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Dallas, TX 75201
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ATTORNEY FOR MOVANT
Ford Motor Credit Company LLC

CERTIFICATE OF SERVICE

I hereby certify that on October 17, 2024, a true and correct copy of the above notice and attached exhibits shall be served via electronic means, if available, otherwise by regular, first-class mail, to:

Via CM/ECF to Counsel for Debtor(s):
Demetrio Duarte, Jr.
Duarte & Molina, PC
2200 Warner

Via US Mail to Debtor(s):
Garcia Grain Trading Corp.
1702 International Blvd.
Weslaco TX 78596

San Antonio, TX 78201

Via CM/ECF to Counsel for Debtor(s):

David R. Langston, Esq.

Brad W. Odell, Est.

Mullin Hoard & Brown, L.L.P.

PO Box 2585

Lubbock, TX 79408

Via US Mail to Debtor(s):

Rodolfo Plascencia, Sr.

4121 N. 10th Street, Suite 125

McAllen, TX 78504

Via CM/ECF to U.S. Trustee:

615 E. Houston Street

Suite 533

San Antonio, TX 78205

Via CM/ECF to Attorney for US Trustee:

Andrew Jimenez, Esq.

515 Rusk Street, Suite 3516

Houston, TX 77002

Attached Service List

/s/ Patrick M. Lynch

Patrick M. Lynch